

Ahilan T. Arulanantham (SBN 237841)  
arulanantham@law.ucla.edu  
Stephany Martinez Tiffer (SBN 341254)  
martineztiffer@law.ucla.edu  
CENTER FOR IMMIGRATION LAW AND  
POLICY, UCLA SCHOOL OF LAW  
385 Charles E. Young Dr. East  
Los Angeles, CA 90095  
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)  
emaclean@aclunc.org  
Michelle (Minju) Y. Cho (SBN 321939)  
mcho@aclunc.org  
ACLU FOUNDATION  
OF NORTHERN CALIFORNIA  
39 Drumm Street  
San Francisco, CA 94111-4805  
Telephone: (415) 621-2493  
Facsimile: (415) 863-7832

Attorneys for Plaintiffs  
*[Additional Counsel Listed on Next Page]*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA  
GONZÁLEZ, FREDDY JOSE ARAPE  
RIVAS, M.H., CECILIA DANIELA  
GONZÁLEZ HERRERA, ALBA CECILIA  
PURICA HERNÁNDEZ, E.R., and  
HENDRINA VIVAS CASTILLO,

*Plaintiffs,*

v.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY, and UNITED STATES OF  
AMERICA,

*Defendants.*

Case No. 25-cv-1766

**EXPERT DECLARATION OF SANTIAGO  
PÉREZ IN SUPPORT OF PLAINTIFF'  
MOTION TO POSTPONE EFFECTIVE  
DATE OF AGENCY ACTION**

1 Additional Counsel for Plaintiffs

2 Jessica Karp Bansal (SBN 277347)

3 jessica@ndlon.org

4 Lauren Michel Wilfong (pro hac vice pending\*)

5 lwilfong@ndlon.org

6 NATIONAL DAY LABORER ORGANIZING NETWORK

7 1030 S. Arroyo Parkway, Suite 106

8 Pasadena, CA 91105

9 Telephone: (626) 214-5689

10 Eva L. Bitran (SBN 302081)

11 ebitran@aclusocal.org

12 ACLU FOUNDATION

13 OF SOUTHERN CALIFORNIA

14 1313 West 8th Street

15 Los Angeles, CA 90017

16 Telephone: (213) 977-5236

**DECLARATION OF SANTIAGO PÉREZ**

1  
2 1. I, Santiago Pérez, am an Associate Professor of Economics at the University of  
3 California, Davis. If called to testify, I could and would do so as follows:

4 2. I have been asked to provide an expert opinion on the impact of terminating  
5 Venezuela's temporary protected status (TPS). I make this declaration based on my personal and  
6 professional knowledge, my skill, experience, training, and education, and facts and data regularly  
7 relied upon in my field that are currently available to me. If additional information becomes  
8 available, or if I believe it would be appropriate to respond to any critique or contrary theories, I will  
9 advise Plaintiffs' counsel that I intend to do so and will seek their help in following the appropriate  
10 judicial procedures. The opinions in this declaration are my own.

11 3. I am an Associate Professor of Economics at the University of California, Davis, and  
12 a Research Associate at the National Bureau of Economic Research (NBER). I am also a faculty  
13 affiliate of the UC Davis Global Migration Center. I have a Ph.D in Economics from Stanford  
14 University. Before completing my Ph.D., I completed a master's degree in economics at the  
15 Universidad de San Andrés (Argentina) and a bachelor's degree in economics at the Universidad de  
16 Buenos Aires (Argentina). I have received grants from the National Science Foundation and the  
17 Russell Sage Foundation, and fellowships from Stanford University and the National Bureau of  
18 Economic Research. A true and correct copy of my curriculum vitae is attached as Appendix A.

19 4. One of my core areas of research is the economic analysis of immigration. I have  
20 published several peer-reviewed articles on immigration-related topics, including articles in the  
21 *American Economic Review* and *American Economic Review: Insights*, two of the flagship journals  
22 of the main association of professional economists in the U.S., the American Economic Association.

23 5. I have published two peer-reviewed articles that deal with one of the fundamental  
24 questions in the economics of immigration. Namely, how do immigrants and their children perform  
25 in the U.S. economy and society? These two studies, which are based on empirical analysis of data  
26 over many years, suggest an optimistic view on the integration of immigrants and their children  
27 (including those of South American origin) in the American economy and society in recent decades.  
28 This research is relevant to understanding the potential consequences of ending TPS for Venezuelan

1 immigrants: the termination of TPS for Venezuela risks expelling thousands of valuable contributors  
2 to American communities.

3         6. My first publication is entitled “Intergenerational Mobility of Immigrants in the U.S.  
4 over Two Centuries.” This peer-reviewed article was published in the *American Economic Review* in  
5 2021. The *American Economic Review* is arguably the most prestigious journal for economics  
6 research. This article studies the intergenerational mobility of children of immigrants in the U.S.  
7 since 1880 to the present day. We found that children of immigrants whose parents entered the U.S.  
8 in the early 1980s, including those whose parents had low levels of income, are doing very well on  
9 the American labor market. For instance, children of immigrants whose parents were in the bottom  
10 quarter of the income distribution ended up, on average, at around the middle of the U.S. income  
11 distribution as adults. Importantly, this success is also present when we focus on the children of  
12 lower-income immigrants from South American countries, including Argentina, Brazil, Chile,  
13 Colombia, or Peru. While there were too few Venezuelan migrants in the 1980s to allow us to  
14 reliably measure the long-term outcomes of their children using the article’s data, the success of  
15 other South American immigrants’ children suggests that children of Venezuelan migrants stand to  
16 perform well in the American labor market. For example, we found that children of lower-income  
17 Argentinian, Brazilian, Chilean, Colombian, and Peruvian migrants rose economically even though  
18 many of their parents arrived without English proficiency or significant financial resources. The  
19 success of these children indicates that the children of Venezuelan immigrants—many of whom  
20 have parents who faced similar barriers—will succeed as well. Indeed, we find that rates of  
21 immigrants’ upward mobility have been remarkably similar throughout American history despite  
22 substantial changes in the number, composition, and country of origin of different immigrant  
23 communities.

24         7. My second publication that is particularly relevant to this context is entitled “Law-  
25 Abiding Immigrants: The Incarceration Gap Between Immigrants and the U.S.-Born, 1870-2020.”  
26 This peer-reviewed paper was published as the lead article in the *American Economic Review:*  
27 *Insights*, which is similar to the *American Economic Review* with respect to quality but is intended  
28 for shorter articles. In this study, we measure gaps in incarceration between immigrants and the

1 U.S.-born from 1870 until the present day. There are two main findings in this study. First,  
 2 immigrants have had lower incarceration rates than the U.S.-born *throughout American history*  
 3 (including lower incarceration rates than U.S.-born *whites*). Second, immigrants' relative  
 4 incarceration rates have actually *declined* since the 1960s in the U.S. Importantly, for the most recent  
 5 period, we find that immigrants from *nearly all* sending countries, including immigrants from  
 6 Venezuela, have lower incarceration rates than the U.S.-born.<sup>1</sup> Hence, immigrants in general, and  
 7 Latin Americans in particular, are, if anything, less likely to have interactions with law enforcement  
 8 that lead to incarceration than are U.S.-born individuals.<sup>2</sup>

9 8. To sum up, these two studies based on large-scale data and careful analysis indicate  
 10 that immigrants in the U.S., including Venezuelan immigrants, have been remarkably successful in  
 11 terms of the labor market as well as other dimensions such as (lack of) propensity to commit crimes.  
 12 It is wrong to paint Venezuelan TPS holders as a group of dangerous criminals who will be a net  
 13 burden on the American economy because my research empirically suggests the opposite. In fact,  
 14 deporting hundreds of thousands of Venezuelan migrants would likely harm the United States by  
 15 depriving it of industrious, law-abiding community members.

16 I declare under penalty of perjury under the laws of the United States of America that the  
 17 foregoing is true and correct to the best of my knowledge.

18  
 19 Executed this 20th day of February, 2025, in DAVIS, CA

20 /s/ [Signature]  
 21 Santiago Pérez

22  
 23  
 24  
 25  
 26 <sup>1</sup> The "Law-Abiding Immigrants" article omitted country-by-country data due to the publisher's  
 length requirements.

27 <sup>2</sup> My latest research has led to another notable finding: refugees fleeing political persecution have  
 28 even lower incarceration rates than other immigrant populations. I am preparing a new article on this  
 topic.

# **APPENDIX A**

**Santiago Pérez**

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CONTACT INFORMATION	University of California, Davis Department of Economics One Shields Ave Davis, CA 95616	seperez@ucdavis.edu
EMPLOYMENT	<b>University of California, Davis</b>  Associate Professor of Economics, 2023-  Assistant Professor of Economics, 2017-2023	
PROFESSIONAL AFFILIATIONS	<b>National Bureau of Economic Research (NBER)</b>  Research Associate, 2023-  Faculty Research Fellow, 2019-2023  <b>Global Migration Center, UC Davis</b>  Associate Faculty, 2017-	
PREVIOUS AFFILIATIONS	<b>National Bureau of Economic Research (NBER)</b>  Post-doctoral Fellow on “The Economics of Mobility”, 2020-2021  <b>Brown University</b>  Visiting Assistant Professor of Economics, 2021-2022	
EDUCATION	<b>Stanford University</b>  Ph.D., Economics, 2011-2017  <b>Universidad de San Andrés</b>  Master, Economics, 2008-2009  <b>Universidad de Buenos Aires</b>  Licenciatura, Economics, 2003-2008	
PUBLICATIONS	<ul style="list-style-type: none"> <li>• <i>Law-Abiding Immigrants: The Incarceration Gap Between Immigrants and the US-born, 1870–2020</i> [joint with Ran Abramitzky, Leah Boustan, Elisa Jacome and Juan David Torres] [AER: Insights, 2024]</li> <li>• <i>Civil Service Exams and Organizational Performance: Evidence from the Pendleton Act</i> [joint with Diana Moreira] [AEJ: Applied Economics, 2024]</li> <li>• <i>Southern (American) Hospitality: Italians in Argentina and the US during the Age of Mass Migration</i> [Economic Journal, 2021]</li> <li>• <i>The Long-Term Spillover Effects of Changes in the Return to Schooling</i> [joint with Ran Abramitzky and Victor Lavy] [Journal of Public Economics, 2021]</li> </ul>	



- *Intergenerational Mobility of Immigrants in the U.S. over the Last Two Centuries* [joint with Ran Abramitzky, Leah Boustan, and Elisa Jácome] [American Economic Review, 2021]
- *Automated Linking of Historical Data* [joint with Ran Abramitzky, Leah Boustan, Katherine Eriksson and James Feigenbaum] [Journal of Economic Literature, 2021]
- *Intergenerational Occupational Mobility Across Three Continents* [The Journal of Economic History, 2019]
- *Linking Individuals Across Historical Sources: A Fully Automated Approach* [joint with Ran Abramitzky and Roy Mill] [Historical Methods: A Journal of Quantitative and Interdisciplinary History, 2019]
- *The (South) American Dream: Mobility and Economic Outcomes of First- and Second-Generation Immigrants in 19th-Century Argentina*, [The Journal of Economic History, 2017, (lead article)]  
*Best Article by a Researcher under 35 (National Academy of Economic Sciences of Argentina)*

- WORKING PAPERS
- *Daughters as Safety Net? Family Responses to Parental Employment Shocks: Evidence from Alcohol Prohibition* [joint with Anna Aizer and Gabrielle Grafton]
  - *The G.I. Bill, Standardized Testing, and the Socioeconomic Origins of the US Educational Elite* [joint with Ran Abramitzky, Jennifer Kowalski, and Joseph Price]
  - *Finding John Smith: Using Extra Information for Historical Record Linkage* [joint with (with Ran Abramitzky, Harriet Brookes Gray, Leah Boustan, Katherine Eriksson, and Myera Rashid] R&R at **Review of Economics and Statistics**
  - *Who Benefits from Meritocracy?* [joint with Diana Moreira]
  - *Railroads and the Rural to Urban Transition: Evidence from 19th-Century Argentina*

- SELECTED WORK IN PROGRESS
- *College Dynasties* [joint with Ran Abramitzky, Jennifer Kowalski, and Joseph Price]

- BOOK CHAPTERS
- *Migration and Immigrant Outcomes at the Destination*, in “Research Handbook of Historical Sociology.” Edited Volume. Edward Elgar Publishing
  - *Argentina in the Age of Mass Migration*, in “Roots of Underdevelopment: A New Economic (and Political) History of Latin America and the Caribbean.” Edited Volume. Palgrave, Macmillan, 2022 [joint with Federico Droller and Martín Fiszbein]

- BOOK REVIEWS
- “Snakes and Ladders: The Great British Social Mobility Myth.” by Selina Todd. Economic History Review (2021)
  - “Migrant Marketplaces: Food and Italians in North and South America.” by Elizabeth Zanoni. Business History Review 93.3 (2019): 645-647.

- RESEARCH GRANTS
- National Science Foundation (\$500,000) [with Ran Abramitzky and Joe Price] 2022
  - Russell Sage Foundation (\$166,553) [with Ran Abramitzky and Joe Price] 2022
  - UC Davis, Small Grant In Aid of Research 2018-2020, 2023-2024
  - Economic History Association, Arthur H. Cole Grant in Aid 2018



FELLOWSHIPS AND AWARDS	Economic History Association Engerman-Goldin Prize [with Abramitzky, Boustan, Eriksson, and Rashid for the <i>Census Linking Project</i> ] 2024 UC Davis Dept. of Economics, Thomas Meyer Distinguished Teaching Award 2023 UC Davis, Hellman Fellowship [with Diana Moreira] 2021 <i>Journal of Economic Geography</i> , Best Referee Award 2020 NBER Postdoctoral Fellowship on the Economics of Mobility 2020 <i>National Academy of Economic Sciences of Argentina</i> , Best Article by a Researcher under the Age of 35 2019 <i>Explorations in Economic History</i> , Excellence in Refereeing Award 2019 Leonard W. Ely and Shirley R. Ely Graduate Student Fund Fellowship 2016-2017 Economic History Association, Dissertation Fellowship 2016 Stanford University, Outstanding TA Award Fall, 2015 SCID Exploratory Award 2015 Economic History Association, Exploratory Data and Travel Grant 2015 Stanford University, Economics Department. Research Grant 2014 Stanford University, Graduate Fellowship 2011/12-2012/13 Universidad de San Andrés. Master Program Scholarship 2009
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INVITED SEMINARS AND CONFERENCE PRESENTATIONS (*CONFERENCE PRESENTATION BY COAUTHORS)	<p><b>2024 (including planned):</b> Universidad de San Andrés; Central Washington University Economic Outlook Conference (keynote speaker); Dondena-Cornell DOCC gathering; Linnaeus University; NBER Summer Institute*; UC Berkeley; San Diego State University; Santa Clara University; Wake Forest University</p> <p><b>2023:</b> Chicago Federal Reserve; NBER Immigrants and the US Economy Conference; UCMX Seminar on the Economics of Immigration; Universidad de Buenos Aires; Corporación Andina de Fomento (CAF); University of Texas, El Paso; University of Arizona; University of Syracuse; Universidad de San Andres Alumni Conference</p> <p><b>2022:</b> Harvard University; World Economic History Congress; Stanford Institute for Theoretical Economics; University of British Columbia; Peking University; Universidad de San Andres Alumni Conference</p> <p><b>2021:</b> Corporacion Andina de Fomento (CAF); University of Melbourne; University of British Columbia; Yale University Economic History Conference; Universidad Nacional de La Plata; Annual Cliometrics Conference; Economic History Association; BREAD Conference*; NBER Summer Institute (X2); Warwick University; Brown University; Northwestern University; Yale University; Rutgers University; PUC Chile; Wilfrid Laurier University; NBER Economics of Mobility; Social Science History Association</p> <p><b>2020 (cancelled due to COVID+):</b> ASSA meetings; Oxford University Historical Perspectives on Intergenerational Mobility; Galatina Summer Meetings+; CEPR Meeting on Structural Transformation and Economic Growth*; University of Southern Denmark; University of Ottawa; NBER Organizational Economics*; Opportunity Insights Lunch Meetings</p> <p><b>2019:</b> Economic History @ UdeSA; 3rd LSE-Stanford-U de los Andes Conference on Long-Run Development in Latin America and Beyond; 12th Migration and Development Conference (Madrid); Workshop on Intergenerational Mobility, Gender and Family Formation in the Long Run (Statistics Norway); NBER Summer Institute; Stanford Institute for Theoretical Economics; Economic History Association; University of Milan Global Challenges Seminar; Udesa Alumni Conference</p> <p><b>2018:</b> University of Arizona; Pontificia Universidad de Católica de Chile; EH Clío Lab</p> <p><b>2017:</b> CU Boulder; University of Notre Dame; UC Davis; Fundacion Getulio Vargas; Universidad de los Andes; Universidad del Rosario; Universidad de los Andes SOM; Northwestern University; UC Berkeley; UC Davis HIA/ISS; UC Irvine; All-California Labor Economics Conference</p> <p><b>2016:</b> Vanderbilt University; LSE Economic History; All-UC Economic History</p>
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	Group Meetings, Economic History Association, NBER Summer Institute (poster session), Annual Cliometrics Conference <b>2015:</b> Universidad de San Andrés Alumni Conference, UC Berkeley Complete Census Count Workshop, Economic History Association (poster session), Stanford SITE Conference <b>2014:</b> Stanford-Berkeley Immigration Conference
INVITED DISCUSSIONS	<b>2025:</b> ASSA meetings (Session chair + Two discussions) <b>2024:</b> LACEA Migration Network Meeting ; Economic History Association meetings (Session chair) <b>2022:</b> Economic History Association meetings (Session chair) <b>2021:</b> CAF Workshop on Intergenerational Mobility in Latin America; Explorations in Economic History Conference on Methodological Advances in the Extraction and Analysis of Historical Data <b>2020:</b> NBER Economics of Mobility Meeting <b>2017:</b> Economic History Association meetings
CONFERENCE ORGANIZATION AND SCIENTIFIC COMMITTEES	<b>2024:</b> Economic History Association Local Arrangements Committee <b>2024:</b> LACEA Migration Network Meeting <b>2023:</b> LACEA LAMES Annual Meeting <b>2022:</b> Stanford Institute for Theoretical Economics (Migration Session)
REFEREEING	<i>AEJ: Applied Economics, AEJ: Economic Policy, American Economic Review, American Economic Review: Insights, American Sociological Review, Applied Economics, Chile's National Research and Development Agency, Demographic Research, Econometrica, Economica, Economic History of Developing Regions, Economic History Review, Economic Journal, European Review of Economic History, Explorations in Economic History, Israel Science Foundation, International Migration Review, Journal of Development Economics, Journal of Economic Geography, Journal of Economic History, Journal of American Ethnic History, Journal of Human Resources, Journal of Labor Economics, Journal of Urban Economics, Journal of the European Economic Association, Journal of Political Economy, Journal of Public Economics, Quarterly Journal of Economics, Regional Science and Urban Economics, Revista de Historia Económica, Review of Economics and Statistics, Review of World Economics, Russell Sage Foundation, Scandinavian Review of Economic History, Canada Foundation for Innovation</i>
DEPARTMENT SERVICE	<ul style="list-style-type: none"> <li>• News committee 2022-</li> <li>• Co-organizer, Economic History Seminar</li> </ul>
CAMPUS SERVICE	<ul style="list-style-type: none"> <li>• U21 Global Leadership Program</li> <li>• Review Committee Alianza UC-MX Collaborative Research Proposals</li> </ul>
TEACHING	<ul style="list-style-type: none"> <li>• <b>UC Davis</b>  Economics of international migrations (<i>undergraduate</i>) Since Fall 2017-  US Economic History (<i>undergraduate</i>) Since Winter 2023-  Economic history (<i>graduate</i>) Since Winter 2018-</li> <li>• <b>Brown University</b>  Inequality and Social Policies (<i>graduate</i>) Fall 2021</li> </ul>

SHORT COURSES AND INVITED LECTURES	• <b>Global Migration Center and Alianza UCMX</b>	
	Summer School on the Economics of Immigration	2022, 2023, 2024
	• <b>Bogotá Summer School of Economics</b>	2024
	• <b>Feria del Libro de Buenos Aires</b> (invited by FamilySearch) “New Technologies to Know Better our History”	2023
	• <b>UCSD, Center for Comparative Immigration Studies</b> A new frontier in immigration research: Historical record linkage	2022
PHD STUDENTS ORAL EXAMINATIONS	<ul style="list-style-type: none"> <li>• Zhixian Lin (UC Davis)</li> <li>• Matthew Curtis (UC Davis)</li> <li>• Tamoghna Halder (UC Davis)</li> <li>• John Blanchette (UC Davis)</li> <li>• Mingxi Li (UC Davis)</li> <li>• Joshua Grelewicz (UC Davis)</li> <li>• Giuseppe Ippedico (UC Davis)</li> <li>• Camila Saez (UC Davis)</li> <li>• Julian Arteaga (UC Davis ARE)</li> <li>• Reem Zaïour (UC Davis)</li> <li>• Juliana Jaramillo Echeverri (LSE Economic History)</li> <li>• Ellen Anderson (UC Davis)</li> <li>• Denis Sosinsky (UC Davis)</li> <li>• Roozbeh Faghihi Moghadam (UC Davis)</li> <li>• Angelita Repetto (UC Davis Sociology)</li> <li>• Ze Zhang (UC Davis ARE)</li> <li>• Beau Bressler (UC Davis)</li> <li>• Alessandro Caiumi (UC Davis)</li> <li>• Carlos Henrique Brito (UC Davis)</li> <li>• Madeleine Ho (UC Davis)</li> <li>• Raymond Kim (UC Merced)</li> <li>• Rebecca Brough (UC Davis)</li> <li>• Wenni Yang (UC Davis)</li> <li>• Gabriela Rubio (UC Davis)</li> </ul>	
PERSONAL INFORMATION	Argentine Citizen, US Permanent Resident, US Census Special Sworn Status	

**Last updated:** December 3, 2024